# Exhibit D

# STATUS OF CLAIMS PROCESSING, LIEN CLEARANCE AND PAYMENTS IN THE NECC NATIONAL SETTLEMENT

### A. Adjudication of Claims by the National Claims Administrator.

As of May 31, 2020, a total of 2,353 claims had been filed with Epiq, the National Settlement Administrator. Of these, 2,027 claims were fully or partially approved by Epiq and/or Judge Neiman, 283 claims were fully denied by Epiq and/or Judge Neiman, 41 were invalid (typically a duplicate claim filed by a spouse), and 2 were withdrawn by the claimant of these claims.

## B. The Tort Trustee's Efforts to Resolve Claims Asserted by Public and Private Entities for Reimbursement of Health Care Costs.

#### 1. Claims for health care cost reimbursement.

As required under federal law, the Tort Trustee submitted the required information on proposed payments to approved claimants to the Center for Medicare Services ("CMS") who promptly returned Medicare eligibility information on each claimant. Information on each approved claimant was provided to the various state Medicaid agencies through a third party, the Garretson Resolution Group ("Garretson"), to determine if those agencies have claims for medical expenses involving these claimants. As of May 31, 2020, State Medicaid eligibility results have been received for all approved claimants. In addition to receipt of lien information from Medicare and Medicaid, the Tort Trustee has also received claims for health care cost reimbursement from various private entities.

### 2. Update on Payments to Finally Approved Claimants

As claimants return properly executed certifications and other forms, claims for reimbursement by public and private entities are thereby cleared. Under the lien resolution agreement with Medicare, Medicare must then provide its final approval for the issuance of payments to claimants within 5 business days. Once Medicare sends its final approval to the Tort Trustee, payments are made to claimants.

As of May 31, 2020, of the 2027 claimants with approved claims, 1976 have cleared their liens and received initial payments and 1970 have received second payments from the National Settlement Fund. Through May 31, 2020, funds disbursed to claimants by the Tort Trustee from the National Settlement Fund total \$97,659,209.71. Additional funds have also been distributed to or segregated for Medicare and other lienholders.

Several letters have been sent to claimants and their attorneys who have not cleared the lien process, informing them what they need to do to clear the remaining liens.

### 3. Status of Third and Final Payments from National Settlement Fund

Paul Moore, the Post-Confirmation Officer, is holding approximately \$11,500,000.00 in additional funds from tax refunds due from certain settling defendants, some of which, on information and belief, remains subject to audit. These escrowed funds are due to be released from escrow in March 2021. Assuming all funds become available to the Tort Trust, these are additional funds that will be included in the third and final distribution in 2021.